# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

#### Alexandria Division

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:19-CR-201

GEORGE AREF NADER,

Defendant.

## **Defendant's Response to Order dated 7/19/2019**

Defendant George A. Nader, through his undersigned counsel, respectfully requests that the following documents, identified by their docket numbers, remain sealed when the court unseals this matter on July 23, 2019:

Docket 18 - (Emergency Motion for Conditional Release filed 6/6/2019) and Attachments

1-5

Docket 33 - (Supplemental Memorandum for Conditional Release filed 6/7/2019) and

Attachments 1-7

Docket 58 - (Motion to Revoke the Detention Order filed 7/19/2019) and Attachments 1-9

The grounds for continuing to seal these docket entries is that the documents refer to or contain Defendant's personal medical information, including identification of his physicians and their specialties, test results and other records, and discussion and opinions of his medical condition by his physicians.

Dated: July 22, 2019

## Respectfully submitted,

#### LATHAM & WATKINS LLP

s/ Clayton D. LaForge Clayton D. LaForge (#84075) Jonathan C. Su (#92804) Timothy H. McCarten (#77044) Savannah K. Burgoyne (#90596) 555 Eleventh St., NW **Suite 1000** Washington, D.C. 20004 Tel: (202) 637-2200 Fax: (202) 637-2201 Clayton.LaForge@lw.com Jonathan.Su@lw.com Timothy.McCarten@lw.com Savannah.Burgoyne@lw.com Christopher J. Clark (pro hac vice) LATHAM & WATKINS, LLP 885 Third Avenue New York, NY 10022 Tel: (212) 906-2927 Fax: (212) 751-4864 chris.clark@lw.com

Jonathan S. Jeffress (#42884) Emily Anne Voshell (#92997) KaiserDillon PLLC 1099 14th Street, NW 8th Fl. West Washington, DC 20005 Tel: (202) 640-4430 Fax: (202) 280-1034 jjeffress@kaiserdillon.com evoshell@kaiserdillon.com

Attorneys for Defendant George Aref Nader